Economic Roundtable
Institutional Review
Board (IRB)

Request for IRB Approval

Must be completed for all projects involving human subjects

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Follow the format shown below to provide requested information

TITLE	*Family-Centered Welfare Research Project*
PRINCIPAL INVESTIGATOR	*Daniel Flaming*
FUNDING	*Foundation funding is being sought; prospects include: California Community, California Endowment, California Wellness, Haynes, Irvine*
LEVEL OF REVIEW	Indicate the level of IRB review you are requesting for this project: ☐ Level I: Exempt Research and Review (no foreseeable risk) **X Level II: Expedited Research and Review (minimal risk)** ☐ Level III: Research and Full Board Review (more than minimal risk or protected subjects) The expedited review procedure may not be used where identification of the subjects and/or their responses would reasonably place them at risk of criminal or civil liability or be damaging to the subject's financial standing, employability, insurability, reputation, or be stigmatizing, unless reasonable and appropriate protections will be implemented so that risks related to invasion of privacy and breach of confidentiality are no greater than minimal.
RISK LEVEL	Identify the level of risk that this project will create for human subjects as defined in Section VI of the Economic Roundtable policy on protection of human subjects: ☐ Less than minimal risk **X Minimal Risk** ☐ Greater than minimal risk but with direct benefit to subjects ☐ Greater than minimal risk but no direct benefit to subjects Briefly summarize the facts that support the risk level you have identified. If the study involves greater than minimal risk, identify all direct benefits to the human subjects as well as any additional safeguards. *This is at most a Level II project, posing no greater than minimal risk to human subjects, because the study will be conducted using existing data, documents and records (page 9, paragraph VII-B-4, Economic Roundtable "Policy on Protection of Human Subjects"). There will be no direct interaction with the human subjects being studied. If a survey component is added to the project at a later date, the survey will be presented to the IRB for a separate review.* *It is also possible to make the case that this is a Level 1 project, posing no foreseeable risk to human subjects, because it is a study of a public benefit program that has been approved by the head of the Department to be studied (page 8, paragraph VII-A-4, Economic Roundtable "Policy on Protection of Human Subjects").*
HEALTH	Identifiable Health Information:

INFORMATION	(1) Do you need to access or use patient/subject identifiable health information (e.g. medical records, mental health information, lab reports, x-rays, tissue samples) for this research study? ***YES*** **If yes**, go to question (2). **If no**, you do not need to satisfy HIPAA education requirement. (2) Have all investigators and individuals authorized to obtain identifiable health information in this study completed an education program regarding federal (HIPAA) and state privacy requirements? ***YES***, *certificates attached* **If yes**, Please provide certificates of completion and go to question (3). **If no**, Your study will not be reviewed until all of the requested information has been provided and your application may be returned to you for completion. (3) Describe the specific procedures and safeguards that will be used to de-identify health information of human subjects in this project *This project presents a methodological problem for expeditiously de-identifying confidential data and then analyzing the data in a non-confidential, de-identified form. The difficulty is that the data to be integrated and studied will be obtained at different times from nine different sources, and some type of record identifier is needed to append each new data set to the previously obtained and integrated data sets. The nine sources of data about Los Angeles County CalWORKs beneficiaries are:* *1. Los Angeles County Department of Public Social Services (via the Chief Administrative Office, Service Integration Branch)* *2. California Employment Development Department, Labor Market Information Division (for employer data)* *3. California Department of Social Services (for CalWORKs participants' wage data)* *4. Los Angeles County Department of Mental Health* *5. Los Angeles County Department of Health Services* *6. Los Angeles County Department of Public Health* *7. Los Angeles County Department of Children and Family Services* *8. Los Angeles County Probation Department* *9. Los Angeles County Sheriff's Department* *The solution to the problem of quickly de-identifying data (for example, within 60 days of receipt of the data as required by the California Department of Social Services) and yet still being able to integrate additional data received at a later date is to use SAS DataFlux version 8 software. This rules-based matching software uses a combination of parsing and standardization rules, phonetic matching, and token-based weighting to standardize source information. After applying thousands of complex rules to each field, the software outputs a "match key" referred to as the "statistical linkage key" (SLK). The SLK is an accurate representation of all versions of the same data—such as different spellings of a name or an address. By assigning an SLK to a record it is possible to link records without using any identifiable information about clients. The code itself is*

anonymous, for example, RX19E4, however the same code will be generated when any permutation of the same identifying information is passed through the SAS DataFlux match code generation algorithm.

The following data integration and de-identification steps will be to produce a nonconfidential database for analysis in this project:

1. *CalWORKs client records will be obtained from Los Angeles County (already accomplished) and all Social Security Numbers (SSN) of members of CalWORKs cases will be sent to the California Department of Social Services to obtain matching wage records.*
2. *Wage records will be aggregated by SSN and quarter to flag records with suspect earnings, which are SSNs with six or more different employers in any single quarter. In past research, 7 percent of records have had this flag.*
3. *Employer Account Numbers in the wage records will be matched against the ES-202 file of employers in Los Angeles County (received from EDD) to identify the industry classification (NAICS) of each employer.*
4. *A single row of wage data will be aggregated for each SSN with earnings, showing total earnings in each quarter and the NAICS code of the employer providing the most earnings. This record will also have a flag if the earnings are suspect.*
5. *Wage data will be integrated with CalWORKs public assistance records based on SSNs. All fields in this combined file containing potentially identifying data will be recoded into generic fields. For example date of birth will be converted into years of age. Addresses will be geocoded and converted to zip codes and census tracts.*
6. *This integrated file containing wage data and public assistance data will be fed into SAS DataFlux software to produce statistical linkage keys, or SLKs for each record. This will become the primary working file for this project. All fields containing individual identifiers such as name, taxpayer identification number, client identification number, address, telephone number, or date of birth will be deleted. Geographic identities will not be specified for areas such as census tracts that contain fewer than five individuals.*
7. *The source file from the California Department of Social Services containing confidential wage data as well as the integrated file containing wage data and CalWORKs public assistance records will be destroyed within 60 days of receipt of the wage data from the California Department of Social Services.*
8. *Subsequently, client records from other county departments will be integrated by: (a) going to the department site and using SAS DataFlux software to assigned statistical linkage keys, or SLKs, to each record. (b) Identifying records that match the research population for this project based on matching SLKs. (c) Exporting a non-confidential data set from department records with all fields containing individual identifiers deleted. (d) Integrating this new non-confidential data set with the larger non-confidential project data set based on matching SLKs.*

INFORMED CONSENT	Indicate the type of informed consent that will be utilized in the study. If a waiver of written informed consent is requested a script of the proposed verbal informed consent should be provided. If a waiver of informed consent is requested please make certain the protocol detail justifies this request. *No data will be obtained directly from human subjects and therefore no informed consent form or script for informing human subjects of their rights will be used. All information is being obtained from client records maintained by public sector agencies, and consent to use this information is being provided by those agencies. Provisions for safeguarding the rights of human subjects and protecting their identities and confidential information are set forth in the following documents:* *1. Motion approved by the Los Angeles County Board of Supervisors authorizing this project, dated June 7, 2005.* *2. Memorandum of Understanding with the Los Angeles County Department of Public Social Services, dated June 19, 2006.* *3. Memorandum of Understanding with the California Employment Development Department Labor Market Information Division and the Los Angeles County Chief Administrative Office, dated June 3, 2007.* *4. California Department of Social Services Confidentiality and Security Requirements agreement, to be executed following review of this application by the Economic Roundtable IRB.* *5. Economic Roundtable Confidential Data Management Policy, approved by the Board of Directors on September 17, 1999 and revised on January 10, 2007.* *6. Economic Roundtable Policy on Protection of Human Subjects, approved by the Board of Directors on October 20, 2006.* *Additional documentation to obtain further clearances is still required for the California Department of Social Services, Review and Evaluation Bureau and the California Department of Social Services Committee for the Protection of Human Subjects. Additional data security agreements are anticipated as agreements are reached with other county departments such as Children and Family Services, Health, Public Health, Mental Health, Sheriff, and Probation to obtain client records of CalWORKs beneficiaries that have been served by those departments.*
LOCATION	Indicate the location where the human subjects involvement will occur. *All confidential data will be kept at the Economic Roundtable office located at 315 West Ninth Street, Suite 1209, Los Angeles, California 90015. No confidential data will leave this office.* *De-identified data that cannot be linked with specific individuals, and which therefore is not longer confidential, may be transferred to locations other than the Economic Roundtable office, for example the office of Dr. Daniel Chandler in Trinidad, California.*
SUBJECTS	Carefully indicate the characteristics of the human subjects that will be involved in the project. When special populations are included or when some or all of the subjects are likely to be vulnerable to coercion or undue influence, indicated what additional safeguards have been included in the study to protect the rights and welfare of these subjects.

	The population being studied is individuals in households where now, or in the past, a member has receive CalWORKs benefits. Most of these individuals have very low incomes, making them dependent of various forms of public assistance. A significant share of the population is made up of children. Disclosure of information assembled for this study could potentially cause embarrassment, compromise entitlement to public assistance, or even result in sanctions or prosecution for violating provisions associated with the public assistance they have received. Safeguards that will be used to protect this potentially vulnerable population include: *1. De-identifying records containing confidential client data and destroying the original records containing personal identifiers.* *2. Following all procedures set forth in the Economic Roundtable's Confidential Data Management Policy and Policy on the Protection of Human Subjects to ensure that no information that can be linked to specific individuals is seen by anyone other than authorized members of the research team.*
REPORTING AND MONITORING	Describe the protocols that will be followed for reporting back to the Institutional Review Board and monitoring data security. *The research team will follow all of the procedures set forth in the Economic Roundtable's Confidential Data Management Policy as well as in agreements with organizations providing confidential data.* *Any study-related events that endanger human subjects or adverse data security events will be promptly reported to the IRB as well as any other organizations whose data is affected.* *Reports on protection of human subjects, data security and project design will be submitted to the IRB semi-annually or more often if requested.*
ATTACHMENTS	Attach the following additional documentation to this request for IRB approval: 1) A transmittal letter stating that no funds will be disbursed to individuals to do research involving human subjects until the proposed project has been reviewed and approved by the IRB. 2) A copy of the grant application or research protocol. 3) Copies of any source instruments (e.g., questionnaires, interview scripts, manipulation protocols, debriefing forms, etc.). Provide translations if these are not in English. *Not Applicable* 4) A proposed informed consent document or narrative. *Not Applicable* 5) The NIH certificate of completion (http://cme.nci.nih.gov) for the principal investigator and all senior research staff for the project.

	January 7 2007
Signature of Principal Investigator	Date of Signature
Daniel Flaming	President
Print Name of Principal Investigator	Title